

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ELVIS BENSON,)
)
) **No. 08 C 2346**
Plaintiff,)
)
)
vs.) **Judge Manning**
)
)
ERIC ECKHORN, GREGORIO)
ANDERSON, UNKNOWN OFFICERS,)
and the CITY OF CHICAGO,)
)
Defendants.)

**DEFENDANT, ERIC ECKHORN'S, AGREED MOTION FOR
EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD
TO PLAINTIFF'S COMPLAINT**

Defendant, Eric Eckhorn, by his attorney, Meghan Kelley Kennedy, Assistant Corporation Counsel, and with the agreement of Plaintiff's counsel, moves this Court for an extension of time until August 11, 2008, to answer or otherwise plead to Plaintiff's Complaint, and in support of this motion states:

1. Defendant Eckhorn was served with Plaintiff's Complaint on June 29, 2008.

Therefore, his Answer or other responsive pleading is due on July 21, 2008.

2. Gregorio Anderson, a co-defendant in this case, is currently on medical leave from his employment with the Chicago Police Department and has not yet been served with plaintiff's Complaint, although the Office of Legal Affairs is working to facilitate service.

3. Because of work-related conflicts, the undersigned has not yet had the opportunity to meet with Defendant Eckhorn to interview him regarding the facts and circumstances alleged in Plaintiff's Complaint. Therefore, we respectfully request a twenty-one day extension, to August 11, 2008, to answer or otherwise plead, so that Officer Eckhorn and his counsel may adequately confer

before filing.

4. This motion is Defendant Eckhorn's first request for an extension of time to answer or otherwise plead. Upon information and belief, Defendant Eckhorn's request for an extension will not prejudice any party nor unduly delay the resolution of the disputed issues.

5. On July 18, 2008, the undersigned sought agreement from Plaintiff's counsel, Rachelle Sorg, for this extension of time, which she has granted.

WHEREFORE, Defendant, Eric Eckhorn, respectfully asks this Court for an extension of time until August 11, 2008, to file his Answer or to otherwise plead to Plaintiff's Complaint.

Respectfully submitted,

BY: /s/ Meghan K. Kennedy
Assistant Corporation Counsel
Attorney for Defendant Eckhorn

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